

KARL J. KRAMER (CA SBN 136433)  
KKramer@mofo.com  
MATTHEW S. CHEN (CA SBN 253712)  
MChen@mofo.com  
EMILY H. SHEFFIELD (CA SBN 269622)  
ESheffield@mofo.com  
PETER H. DAY (CA SBN 275155)  
PDay@mofo.com  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, California 94304-1018  
Telephone: 650.813.5600  
Facsimile: 650.494.0792

Attorneys for Plaintiff  
JAHIR ALBERTO ROJAS

KAMALA D. HARRIS  
Attorney General of California  
MICHAEL W. JORGENSEN  
Supervising Deputy Attorney General  
D. ROBERT DUNCAN (CA SBN 161918)  
Deputy Attorney General  
EMILY L. BRINKMAN (CA SBN 219400)  
Deputy Attorney General  
455 Golden Gate Avenue, Suite 11000  
San Francisco, California 94102-7004  
Telephone: 415.703.5739  
Facsimile: 415.703.5843  
E-Mail: Robert.Duncan@Doj.Ca.Gov

Attorneys for Defendants  
R. LOZA, D. SANDOVAL and R. SINGH

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JAHIR ALBERTO ROJAS,

Plaintiff,

v.

R. LOZA, Correctional Officer; R. SINGH,  
Correctional Officer; D. SANDOVAL,  
Correctional Officer,

Defendants.

Case No. 3:07-CV-04662-MMC

**JOINT STIPULATED REQUEST  
FOR AN ORDER AND  
~~PROPOSED~~ ORDER STAYING  
ALL FURTHER PROCEEDINGS  
PENDING SETTLEMENT  
AND DIRECTIONS TO PARTIES**

Ctrm: 7, 19th Floor  
The Honorable Maxine M. Chesney

1 WHEREAS, the Parties reached an agreement in principle settling their dispute on June 3,  
2 2011 and are presently drafting a settlement agreement; and

3 WHEREAS, the Parties wish to avoid the expense of continued litigation while pursuing  
4 final settlement;

5 WHEREAS, the parties expect to finalize and close a final settlement agreement  
6 promptly, however, in view of expected logistical, procedural, and budgetary constraints of the  
7 State of California, a settling party in this action, the Parties project that it may take up to 180  
8 days to complete the formal settlement in this matter.

9 WHEREAS, the parties agree that nothing in this stipulation shall preclude either Party  
10 from renewing the instant case should the other Party fail to perform its obligations under either  
11 the Agreement in Principle or the final settlement agreement.

12 IT IS HEREBY STIPULATED by and among the Parties that Parties hereby jointly  
13 request that the Court enter an order staying all proceedings in this matter until the earlier of  
14 December 1 , 2011, the Parties fulfillment of their obligations under the final settlement  
15 agreement, or such other date as the Court deems appropriate. Upon the Parties' successful  
16 completion of the Final Settlement Agreement, the Parties shall file a joint stipulation dismissing  
17 the instant action with the Court.

1 Dated: June 6, 2011

KARL J. KRAMER  
MATTHEW S. CHEN  
EMILY H. SHEFFIELD  
PETER H. DAY  
MORRISON & FOERSTER LLP

5 By: /s/ Peter H. Day  
PETER H. DAY

7 Attorneys for Plaintiff  
JAHIR ALBERTO ROJAS

8 Dated: June 6, 2011

KAMALA D. HARRIS  
Attorney General of California  
MICHAEL W. JORGENSEN  
Supervising Deputy Attorney General  
D. ROBERT DUNCAN  
Deputy Attorney General  
EMILY L. BRINKMAN  
Deputy Attorney General

14 By: /s/ Emily L. Brinkman  
EMILY L. BRINKMAN

16 Attorneys for Defendants  
LOZA, SINGH, AND SANDOVAL

17 **GENERAL ORDER 45 ATTESTATION**

18 I, Peter H. Day, am the ECF User whose ID and password are being used to file this  
19 JOINT STIPULATED REQUEST FOR AN ORDER AND [PROPOSED] ORDER STAYING  
20 ALL FURTHER PROCEEDINGS PENDING SETTLEMENT. In compliance with General  
21 Order 45, X.B., I hereby attest that EMILY L. BRINKMAN has concurred in this filing.

22 Dated: June 6, 2011

23 By: /s/ Peter H. Day  
PETER H. DAY

1 PURSUANT TO STIPULATION, IT IS SO ORDERED. Specifically, the above-titled action is  
2 hereby STAYED until further court order. All pretrial deadlines and dates, as well as the  
3 October 31, 2011 trial date, are VACATED. The parties are DIRECTED to file a Joint Status  
Report no later than December 2, 2011.

4  
5 Dated: June 8, 2011

6   
7 Honorable Maxine M. Chesney  
United States District Court Judge